

-7-

REMARKS

This is in response to the Office Action mailed on March 11, 2005. In the Office Action, claims 1-11 were pending of which claims 1-11 were rejected. With this Amendment, claims 1 and 3 have been amended and claim 2 has been canceled. New claims 12 and 13 are added. Reconsideration and allowance of all pending claims are respectfully requested in view of the following remarks.

On page 3 of the Office Action, claims 1-6, 8 and 11 were rejected under 35 U.S.C. §102(e) as being anticipated by Ikeda et al. (U.S. Patent Application No. 2003/0109949, hereinafter "Ikeda"). In general, Ikeda pertains to a design-for-product creating system in which a product vendor provides a user with a product design program. The user "downloads the product design program and digital part data into his/her own computer, creates a desired unique design for a product, and asks the product vendor over the Internet to manufacture a product of the unique design" (page 1, para 0011). Simply put, Ikeda provides users with the ability to use a design program allowing for the creation of unique designs which may be submitted to the vendor for manufacture.

Claim 1, which has been amended to include the limitations previously contained in claim 2, recites a "method of providing designer product planning information to a customer of an office furniture system workstation manufacturer in order to customize office system workstations." Claim 1 further recites, in part, "transmitting computer executable instructions over the computer network to the client computer, which when executed on the client computer cause a web browser on the client computer to prompt the customer to input designer product configuration preferences; receiving over the computer network from the client computer the designer product configuration preferences input by the customer; retrieving drawing data, from a database of designer product drawings, for a drawing of a designer product corresponding to the configuration preferences input by the customer; and transmitting computer executable instructions corresponding to the retrieved drawing data over the computer network to the client computer, which when executed on the client computer cause the web browser on the client

-8-

computer to display the drawing of the designer product corresponding to the configuration preferences input by the customer" (emphasis added).

In view of the following, it is respectfully submitted that Ikeda is fundamentally different than the method recited in claim 1. First, Ikeda teaches a design program allowing the user to uniquely design and view products. It is directed to the use of three-dimensional part data to allow users to "customize" products to their own likeness. The functionality of the design program is the basis of Ikeda as the design program is self-contained and allows the user access to all applicable design functionality. Ikeda simply does not teach or suggest causing a web browser on the client computer to prompt the customer to input designer product configuration preferences as recited in claim 1. The use of a web browser to input design preferences, to transmit said preferences over a computer network, and to subsequently receive (over the computer network) and display the corresponding product design reduces the need to have such a large design program which must include data for all possible designs. It further dispenses with the need to download such a large design program to the client computer.

Additionally, Ikeda does not teach or suggest retrieving a drawing of a designer product corresponding to the configuration preferences input by the customer received over the computer network from the client computer. Ikeda simply describes the design process and subsequent submittal to the manufacturer using the design program. As best can be gleaned from Ikeda, all design data is self contained in the design program as there is simply no mention of transmitting over the computer network to the client computer, computer executable instructions corresponding to the retrieved drawing data to display the drawing of the designer product corresponding to the configuration preferences input by the customer. Ikeda simply does not mention communication regarding the product design to and from the client computer over the computer network. In sum, Ikeda does not teach or suggest the transmitting, receiving, and retrieving steps recited in claim 1.

Additionally, while Ikeda does suggest utilizing the design program to allow customer to uniquely design furniture, the design of furniture is fundamentally different than the design of office furniture system workstations. Such design of office furniture system

-9-

workstations includes configuration information beyond simple size and shape characteristics of a chair or a desk for example. The present invention allows a user to design a complex system workstation without the need of drawing data corresponding to all possible configurations to be downloaded to the user computer as is required in Ikeda. In view of the forgoing reasons, it is respectfully submitted that claim 1 is neither taught nor suggested by Ikeda and is in allowable form.

Further, it is respectfully submitted that claims 3-6, 8 and 11 are also in allowable form at least based on their relation to claim 1. Additionally, it is believed that many of these dependent claims contain additional limitations that are neither taught nor suggest by Ikeda. In particular, claims 3-6 recite transmitting computer executable instructions over the computer network to the client computer, which when executed on a client computer cause the web browser on the client computer to prompt the customer to input a preferred workstation configuration, a preferred workstation size, a preferred workstation quantity, or a preferred workstation orientation, respectively. It is noted that Ikeda utilizes a product design program and makes no mention of causing the web browser on the client computer to prompt the customer to input the above mentioned product configuration preferences. Ikeda simply discloses that the user utilizes the program to design the product and that product design is submitted to the vendor over the internet. Additionally, dependent claim 8 recites causing the "web browser on the client computer to display a plurality of different downloadable file types, each corresponding to designer product preferences input by the customer." Ikeda simply does not teach or suggest display of such a plurality of different downloaded file types either in the portions cited in the Office Action (page 7, para 0166-0172) or elsewhere.

On page 6 of the Office Action, claim 7 was rejected under 35 U.S.C. §103(a) as being unpatentable over Ikeda in view of Quintero et al. (U.S. Patent No. 5,293,479). It is respectfully submitted that claim 7 is allowable at least based on its relation to claim 1. However, it is submitted that there is no suggestion or motivation to combine Ikeda and Quintero as they relate to inventions that are fundamentally different. In particular, Quintero pertains to a knowledge base which includes a plurality of records pertaining to types of connectable components, where

-10-

there are records containing characteristics for connective components and rules as needed to define combining the component with other connectable components. In this manner, there is simply no suggestion or motivation to combine Quintero with a system involving a downloadable program which allows a user to customize product components as recited in Ikeda. In fact, such a combination would destroy the functionality taught in Quintero. As product components are user modified using the design program, the resultant unique product components would require unique rules outside the scope of Quintero. A set of rules regarding the connection of product components is simply inapplicable in the context of a design program enabling the unique design of said components. As such, even if the rules and records in Quintero regarding connectivity of components were combined with the design program recited in Ikeda, the resultant combination would not achieve the method recited in claim 7. Accordingly, it is respectfully submitted that claim 7 is in allowable form.

On page 8 of the Office Action, claim 9 was rejected under 35 U.S.C. §103(a) as being unpatentable over Ikeda in view of Han et al. (U.S. Application No. 2002/0052807). Applicant agrees with the assertion in the Office Action that Ikeda does not expressly teach that the plurality of different file types include one or more of a two-dimensional drawing file and a bill of materials file. However, it is noted that the different file types disclosed in Han pertain to on-line product catalog services which support the creation and maintenance of on-line catalogs of product data. In this manner, there is simply no motivation to combine creation of on-line product catalogs as disclosed in Han with a design program which allows users to create unique product configurations as recited in Ikeda. Notwithstanding, the combination of Ikeda and Han does not teach or suggest the method recited in claim 8. Such a combination would only provide a downloadable product catalog and would not allow for the user to download data pertaining to the users uniquely designed product. Accordingly, Applicants respectfully submit that claim 9 is in allowable form.

On page 9 of the Office Action, claim 10 was rejected under 35 U.S.C. §103(a) as being unpatentable over Ikeda in view of Ouchi (U.S. Patent Application No. 2003/0078975). It is

-11-

respectfully submitted that claim 10 is allowable at least based on its relation to an allowable base claim.

In view of the forgoing, it is respectfully requested that the rejections of claims 1 and 3-11 be withdrawn. Reconsideration and allowance of all pending claims are respectfully requested.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

WESTMAN, CHAMPLIN & KELLY, P.A.

By: John D. Veldhuis-Kroeze  
John D. Veldhuis-Kroeze, Reg. No. 38,354  
Suite 1400 - International Centre  
900 Second Avenue South  
Minneapolis, Minnesota 55402-3319  
Phone: (612) 334-3222  
Fax: (612) 334-3312

CV/JVK/jme